

# County Market

TOTAL DISCOUNT FOODS

April 9, 2003

The Honorable Ann Veneman  
Secretary, U.S. Department of Agriculture  
Country of Origin Labeling Program  
Agricultural Marketing Service  
Stop 0249 Room 2092-S  
1400 Independence Avenue, SW  
Washington, DC 20250-0249

06-4219515  
AMS

**Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program**

Dear Secretary Veneman:

I am the Director of Perishables for County Market/Cub Foods. As such, I am very concerned about the country of origin labeling guidelines that you issued.

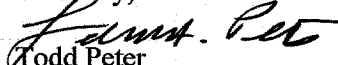
Our meat department offers over a 1,000 types of whole muscle and ground beef, pork, and lamb products to consumers on a daily basis. The task of identifying the country in which the underlying animal or animals for each of those products was born, raised and slaughtered is enormous. We must be able to depend on our suppliers for that information and you must hold them accountable through strict enforcement mechanisms. We cannot look at a package of hamburger and determine whether the cow was born and raised in Canada or born in the U.S. and raised in Canada or born, raised and slaughtered in the U.S. Moreover, the operational challenges of labeling each of those items for retail sale on a daily basis are substantial.

As you develop the regulations, please consider the following:

- Hold suppliers who are responsible for cattle, hogs and lamb at birth, feeding and slaughter accountable for providing accurate information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of meat products at retail; and
- Implement reasonable recordkeeping requirements.

Please issue regulations that will be simple to follow and to implement.

Sincerely,



Todd Peter  
Director of Perishables  
Niemann Foods, Inc.